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Answer given by Executive Vice-President Virkkunen
on behalf of the European Commission
(26.3.2026)

Telegram is not designated as a very large online platform but must comply with the applicable rules of the Digital Services Act (DSA)¹. These rules include obligations related to notice and action procedures, independent means of redress, and transparency regarding terms of service and content moderation decisions. Telegram has appointed its legal representative in Belgium; the Belgium Digital Services Coordinator (DSC) is therefore competent for the supervision and enforcement of the DSA with respect to Telegram. The Commission is in regular contact with the Belgium DSC, notably to discuss Telegram and the actions foreseen or already taken by them and assist when required.

Telegram is a hybrid service consisting of online platform and non-online platform features.

According to Telegram's published information, and in contrast with WhatsApp's published information, the users of its online platform features are below the designation threshold². In light of Article 24 DSA and the ruling in Case T-348/23³, if a provider is able to isolate the online platform features' users from the total number of users, then it is possible to count only the former for the purposes of the reporting obligation laid down in that provision.

The Commission monitors the evolution of user numbers and takes into consideration all relevant sources of information.

The Commission under Article 33(3) DSA may adopt a delegated act to supplement the provisions of the DSA by laying down the methodology for calculating the number of average monthly active recipients of online platforms and of search engines in the EU. The Commission continues to monitor the appropriateness of adopting such a delegated act.

¹ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act), OJ L 277, 27.10.2022, p. 1-102.

² <https://telegram.org/tos/eu-dsa>; <https://www.whatsapp.com/legal/transparencyreports>.

³ Judgment of 3 September 2025, *Zalando v Commission*, T-348/23, EU:T:2025:821.